

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MICHAEL AND SHELLIE GILMOR, <u>et al.</u> ,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 4:10-cv-00189-ODS
)	
PREFERRED CREDIT CORPORATION, <u>et al.</u> ,)	
)	
Defendants.)	
)	

**UNOPPOSED JOINT MOTION FOR EXTENSION OF TIME TO DESIGNATE
EXPERT WITNESSES AND TO COMPLETE DISCOVERY**

Plaintiffs and certain Defendants¹ respectfully move the Court for an Order extending the deadlines by which Defendants must designate their expert witnesses and by which the parties must complete discovery. In support of this motion, the parties state as follows:

1. Currently, Defendants' expert designations are due by April 30, 2012, and the discovery deadline is June 1, 2012.

2. Discovery is currently ongoing and additional information continues to be exchanged. The parties continue to discuss the outstanding and prior discovery requests and are endeavoring to provide full and complete responses as expeditiously as possible. In specific regard to the expert designation, IFC has requested certain information utilized by Plaintiffs' proposed experts, which Plaintiffs intend to provide in the immediate term. IFC wishes to have its experts review this information before completing their reports.

¹ The Moving Defendants include Impac Funding Corporation ("IFC") and the other entities listed in counsel's signature block. The moving parties consulted the other defendants, none of whom objected to the relief sought herein.

3. Due to the foregoing, Defendants require additional time to complete the expert designations. The parties request a one-week (7-day) extension for Defendants to make their expert designations. This extension would be identical to an extension sought by the parties by motion filed March 2, 2012, so that Plaintiffs could complete their expert designations. Based on the proposed extension, Defendants would make their expert designations by May 7, 2012.

4. Additionally, Plaintiffs have requested, and Defendants consented to, a two-week (14-day) extension of the discovery deadline. Based on the proposed extension, discovery would close on June 15, 2012. Counsel for the parties agree that the additional time is reasonably necessary to complete the remaining discovery.

5. The additional time requested will not result in any delay in the case, as the proposed deadline for Defendants' expert designations would occur before and not affect any other deadline in this case, and the proposed discovery deadline also would not affect any subsequent deadlines in this case. Therefore, the requested extensions will not adversely affect any of the other scheduling or trial deadlines.

6. The instant request to extend the deadlines is made in good faith, not for the purpose of delay, and will not prejudice any party.

7. Counsel for the other defendants have been consulted and have indicated no opposition to the requested extensions.

WHEREFORE, the parties jointly move this Court for an Order extending the deadline by which Defendants must make their expert designations to May 7, 2012, and extending the

deadline for the close of discovery to June 15, 2012, and for any other relief that the Court deems just and proper.

Respectfully submitted,

April 27, 2012

/s/ Bruce V. Nguyen

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Attorneys for Defendants Impac Mortgage Holdings, Inc.; Impac Funding Corporation; Impac Secured Assets Corporation; IMH Assets Corporation; Impac Real Estate Asset Trust Series 2006-SD1; Deutsche Bank National Trust Company, in its capacity as trustee for the 2006-SD1 Trust and as former trustee for the following trusts, all of which have terminated: Impac Secured Assets CMN Trust Series 1998-1, Impac CMB Trust Series 1999-2, Impac CMB Trust Series 2000-2, Impac CMB Trust Series 2001-4, Impac CMB Trust Series 2002-1, and Impac CMB Trust Series 2003-5; Bank of America, National Association, as successor by merger to LaSalle National Bank, in its capacity as former trustee of terminated trust Impac CMB Trust Series 1999-1; Wells Fargo Bank, N.A., in its capacity as former trustee for terminated trust Impac Mortgage Pass-Through Certificates 2000-1; and Wingspan Portfolio Advisors, LLC

April 27, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2012, the foregoing was filed using the Court's CM/ECF system, which will notify all registered parties of the filing.

/s/ Barry L. Pickens